

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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**JUN 15 1992**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of  
  
Local Exchange Carrier Line  
Information Data Base

)  
) CC Docket No. 92-24  
)  
)

REPLY OF THE  
NYNEX TELEPHONE COMPANIES

New York Telephone Company  
and  
New England Telephone and  
Telegraph Company

Patrick A. Lee  
Edward E. Niehoff

120 Bloomingdale Road  
White Plains, NY 10605  
914-644-5971

Their Attorneys

Dated: June 15, 1992

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## SUMMARY

In this Reply, the NTCs respond to the comments of the parties that filed oppositions or comments to the NTCs' Direct Case.

The NTCs demonstrate that, contrary to the arguments of several commenters, they have adequately described their LIDB Access Service tariff. Virtually all of the information listed by the Bureau in the Designation Order or suggested for inclusion in the tariff by commenters is already contained in the tariff, or if inappropriate for inclusion in the tariff, is readily available from other public sources. Furthermore, the NTCs have addressed the issue of liability for fraud and erroneous validation data through a limitation of liability provision that is reasonable in scope, and absolutely necessary to provide LIDB Access Service to their customers at reasonable rates.

The NTCs have also shown why the use of the CCSCIS cost model is appropriate. Furthermore, they have shown that the CCSCIS cost model is proprietary and contains trade secrets and, contrary to the arguments of several commenters, that public disclosure of the CCSCIS cost model should not be required.

Finally, the NTCs have demonstrated that their proposed rates for LIDB Access Service and CCSA interconnection are not excessive. With respect to LIDB Access Service, the NTCs have demonstrated that the rates are just and reasonable

since they are consistent with the prices of competitive alternatives, pass the net revenue test and cover relevant costs. With respect to CCSA interconnection, the NTCs have demonstrated that the rates meet the requirements for restructured services contained in the Commission's rules.

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REPLY OF THE  
NYNEX TELEPHONE COMPANIES

New York Telephone Company ("NYT") and New England Telephone and Telegraph Company ("NET") (collectively the "NYNEX Telephone Companies" or "NTCs") hereby file their Reply to the oppositions and comments to their Direct Case in the above matter.<sup>1</sup>

I. INTRODUCTION

On March 20, 1992 the Bureau released its order designating the issues for investigation in the above matter ("Designation Order"), and the NTCs filed their Direct Case ("Direct Case") on April 21, 1992 responding to the issues raised by the Bureau in the Designation Order. Oppositions or comments to the NTCs' Direct Case were filed on June 5, 1992.

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<sup>1</sup> Oppositions or comments were filed on June 5, 1992 by MCI Communications Corporation ("MCI"); Sprint Communications Company Limited Partnership ("Sprint"); International Telecharge, Inc. ("ITI"); Allnet Communication Services, Inc. ("Allnet"); and, The Competitive Telecommunications Association ("CompTel").

The NTCs address below the comments of the parties that filed comments or oppositions to the NTCs' Direct Case.

II. THE NTCs HAVE ADEQUATELY DESCRIBED LIDB ACCESS SERVICE

The initial question posed by the Bureau in the Designation Order was:

Have the LECs adequately described the LIDB query service in the tariffs?<sup>2</sup>

The Bureau cited the allegations of several petitioners that the tariffs lack sufficient detail, and should contain some or all of the following information:

- a) LEC liability for erroneous information in the data base and liability for calling card fraud;
  - b) The frequency, nature and priority of data base updates; and
  - c) Additional technical information, including "call gapping" procedures, and the dates of the latest revisions to technical publications referenced in the tariff.<sup>3</sup>
- A. Liability For Erroneous Information And Calling Card Fraud

Several commenters take issue with the limitation of liability contained in the LIDB Access Service tariff and argue that the NTCs and other LECs "must assume responsibility for

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<sup>2</sup> Designation Order, ¶ 2(I).

<sup>3</sup> Ibid.

the accuracy of their data base information."<sup>4</sup> Others claim that the limitation of liability in the tariff is discriminatory because "there is an enormous inconsistency between the allocation of risk of liability for fraud among the LECs and AT&T under their Mutual Honoring Agreements ('MHAs') and the allocation of risk available to all other IXC's under the LIDB tariffs."<sup>5</sup>

MCI argues that the LECs "assum[e] no meaningful responsibility for validating calls in the face of fraud".<sup>6</sup> MCI further states that the Commission "must...require that each LEC assume responsibility for calling card fraud arising from use of its LIDB data base."<sup>7</sup>

MCI simply repeats the same arguments made in its earlier pleadings in this proceeding.<sup>8</sup> As the NTCs demonstrated in their Direct Case, the issue of NTC liability for erroneous information in the data base, and fraudulent use of calling cards is clearly addressed in the LIDB Access Service tariff.<sup>9</sup> Furthermore, the limitation of liability

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4 MCI at p. 10.

5 ITI at p. 1; See also CompTel at pp. 2-5.

6 MCI at p. 17.

7 Ibid.

8 See MCI Petition to Reject or, in the Alternative, Suspend and Investigate the NTCs' Transmittal No. 60, dated November 27, 1991 pp. 4-6.

9 The tariff provides that, in the absence of willful misconduct, the NTCs' liability to their LIDB Access Service customers, in the event incorrect validation data is provided, is limited to an amount equal to the charge to the customer for processing the validation query. See Tariff FCC No. 1, Section 2.1.3(A) and Section 21.1.2.

contained in the LIDB Access Service tariff is both reasonable and appropriate. Liability limitations apply to all telephone services, and through application of these provisions the NTCs protect themselves, and ultimately their customers, from incidental and consequential damages such as lost revenues or lost profits. Courts have long recognized the reasonableness and enforceability of liability limitations in connection with tariffed services.<sup>10</sup> The NTCs have also shown that this limitation of liability is reasonable, and is consistent with liability limitations for other tariffed services as well as with liability limitations commonly employed in commercial transactions.<sup>11</sup> MCI's arguments should therefore be rejected.

Other commenters such as ITI and CompTel argue that the Mutual Card Honoring Agreements ("MHAs") between AT&T and several BOCs contain limitation of liability provisions significantly different from those contained in the BOCs' LIDB tariffs, and that the BOCs are thus discriminating in favor of AT&T. These arguments are without merit and should be rejected by the Commission.

The NTCs have executed an interim MHA with AT&T. That agreement does not change the LIDB tariff's liability provisions but merely sets forth the methodology for determining the amount due AT&T for AT&T calls made with an NTC calling card that are billed by the NTCs on their portion of the customer's bill. The MHA defines the terms and conditions

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<sup>10</sup> See Direct Case at pp. 6-8.

<sup>11</sup> Id. at pp. 8-9.



pursuant to which AT&T and the NTCs bill and collect for each other's calling cards for calls made on the other's network. The interim MHA between AT&T and the NTCs, however, will expire soon and it is expected that the parties will commence negotiations in the near future concerning a new MHA.

The Commission has held that LECs may enter into card honoring agreements, so long as they do so on a non-discriminatory basis.<sup>12</sup> The NTCs are willing to enter into agreements on a nondiscriminatory basis with all carriers that will honor the NTCs' calling cards and will agree to permit the NTCs to honor their cards. Therefore, since 1) the MHA does not alter the terms of the LIDB Access Service tariff, and 2) the NTCs will offer to enter into substantially similar MHAs with all other carriers that issue calling cards, no Commission investigation is warranted.<sup>13</sup>

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<sup>12</sup> See In the Matter of Policies and Rules Concerning Local Exchange Carrier Validation and Billing Information for Joint Use Calling Cards, CC Docket No. 91-115, Report and Order and Request for Supplemental Comment, released May 8, 1992, ¶ 36. ("We adopt our proposal that a LEC which agrees to enter into an agreement with one IXC to accept its calling card for LEC services and query that IXC's data base to validate the card, must do so on a non-discriminatory basis for all other IXCs, if they so request.")

<sup>13</sup> It should be noted that AT&T subscribes to LIDB Access Service, and that it is subject to the same tariff terms and conditions, including the limitation of liability provisions contained in the tariff, as all other LIDB Access Service customers.

B. Other Terms And Conditions

MCI argues that the LIDB Access Service tariff lacks required specificity in a number of areas. Specifically, MCI claims that each of the LECs' LIDB tariffs must contain information on a wide range of matters, such as (1) an explanation of the data that is available in the LIDB data base; (2) identification of the independent telephone companies whose data is stored in the data base; (3) whether the LIDB data base will be updated daily; (4) whether there will be a 24 hour single point of contact for LIDB customers; (5) whether customers will be provided with the scheduled downtime for the data base; (6) the dates of the latest revisions to all referenced technical publications; (7) a description of the company's call gapping procedures; and (8) a description of the company's fraud prevention system.<sup>14</sup>

As the NTCs noted in their Direct Case, the LIDB Access Service tariff will be amended to include a provision stating that (1) routine updates of the LIDB will be conducted daily during normal business hours; and (2) the LIDB will be updated twenty four hours per day, seven days per week to reflect restrictions on NTC calling card use arising from fraudulent activity.<sup>15</sup> In all other respects, however, the LIDB Access Service tariff contains an adequate description of

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<sup>14</sup> MCI at pp. 6-7.

<sup>15</sup> See Direct Case at p. 9. These procedures are consistent with procedures for updating LIDB currently employed by the NTCs.

the service.<sup>16</sup> The remaining items noted by MCI are either already contained in the LIDB Access Service tariff,<sup>17</sup> or while not appropriate for inclusion in the tariff, are available from other sources.

First, a description in the tariff of the fraud prevention system, or a single point of contact are not necessary or appropriate. The NTCs have a twenty four hour Database Administration Center ("DBAC") for fraud surveillance of the LIDB as well as a Signaling Engineering and Administrative Center ("SEAC") that is responsible for correcting network problems or errors. The phone number and fax number of the SEAC are published in the LIDB Access Routing Guide published monthly by Bellcore, while the fax number of the DBAC has been provided to all LIDB Access Service customers, including MCI. Furthermore, as the NTCs noted in their Direct Case<sup>18</sup> their data base update and fraud control procedures will necessarily change from time to time based on the NTCs' experience with LIDB Access Service, and in response to improved technology. There would thus be no benefit to LIDB Access Service customers, while it would clearly be burdensome to the NTCs, to require a tariff revision whenever the NTCs

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<sup>16</sup> See 47 C.F.R. § 61.54(j).

<sup>17</sup> Of the items enumerated by MCI, information on call gapping, the latest date of technical publication referenced in the tariff and an explanation of the data available in the LIDB data base is already included in the LIDB Access Service tariff.

<sup>18</sup> See Direct Case at p. 10.

desire to revise their internal procedures for administering the LIDB data base.<sup>19</sup>

Information concerning the independent telephone companies whose data is stored in the various LIDBs is also already publicly available, and should not be included in the tariff. The independents whose data is stored in each LIDB data base are identified in the LIDB Access Routing Guide, to which MCI subscribes. Since LECs have the option to change from one LIDB administrator to another, disclosure of this information through the monthly Access Routing Guide is preferable to requiring a tariff change each time a LEC is either added to or deleted from a particular LIDB data base.

Finally, it is not necessary that LIDB Access Service customers be provided with notice of the scheduled down time for the data base. The NTCs have redundant LIDBs for survivability, and the two LIDBs would not be scheduled for maintenance simultaneously. Thus scheduled maintenance down time should not be service affecting.

### III. THE NTCs' TARIFF ADEQUATELY DESCRIBES THE TECHNICAL PARAMETERS FOR THE CCS INTERCONNECTION LINK

In the Designation Order, the Bureau asked parties to comment as to whether tariffs for CCS interconnection links should include a level of detail similar to the technical

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<sup>19</sup> Furthermore, as the NTCs also noted, it is clearly in the NTCs' interest, as a user of LIDB, to have a procedure for updating LIDB as often as possible, and otherwise ensuring the accuracy of the validation data. Requiring a detailed description of their procedures in the tariff is simply unnecessary.

parameters for a 56 kbps line contained in their Special Access tariffs.<sup>20</sup> In their Direct Case, the NTCs demonstrated that the technical description for the CCSA STP Links, by reference to a technical publication, is comparable to the technical description of the 56 kbps Special Access lines found elsewhere in the NTCs' tariffs. MCI argues that the responses of the NTCs and other parties on this point are "unsatisfactory" and that the Commission should "direct the LECs to state in their tariffs the similarities and differences"<sup>21</sup> between their 56 kbps DDS services and the CCS STP links.

MCI's argument should be rejected. There is no reason to require a more detailed tariff description of the CCSA STP Link than any other 56 kbps service. Furthermore, there is no precedent for requiring that descriptions of similarities and differences between various services be included in the tariff. The CCSA STP Link is adequately described in the tariff. Comparisons with other similar services are unnecessary.<sup>22</sup>

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20 Designation Order, ¶ 2(II).

21 MCI at pp. 18-19.

22 MCI also notes that there are certain technical differences between the 56 kbps Special Access line and STP Links used for CCSA interconnection and suggests it may not be appropriate, as the NTCs and other LECs have done, to use tariffed 56 kbps DDS rates as the rates for CCSA interconnection. MCI is incorrect. While there are minor technical differences between the two services, the facility and circuit equipment used to provide the two services is identical. It is, therefore, reasonable to employ the 56 kbps DDS rate for CCSA interconnection.

IV. THE NTCs SHOULD NOT BE REQUIRED TO FILE THE CCSCIS MODEL ON THE PUBLIC RECORD

As noted in their Direct Case, the NTCs used a cost model, known as Common Channel Signaling Cost Information System ("CCSCIS"), to develop the costs used in developing the rates for CCSA interconnection and LIDB Access Service.<sup>23</sup> CCSCIS is comprised of (i) computer software; (ii) documentation that explains the methodologies of the CCSCIS software; and (iii) vendor engineering, pricing and operational information that is used with the CCSCIS software. The NTCs demonstrated in their Direct Case that CCSCIS is appropriate for use in developing the costs associated with services which use CCS equipment, such as LIDB Access Service and CCSA interconnection.

MCI and Allnet both argue, however, that the Commission should require the LECs to make the CCSCIS model available for public scrutiny.<sup>24</sup> These arguments should be rejected by the Commission.

CCSCIS was developed by Bellcore. It is owned by Bellcore, which claims trade secret and copyright protection for the CCSCIS software and CCSCIS documentation. The vendor information utilized with the CCSCIS software is made available to Bellcore by third-party vendors of equipment pursuant to confidentiality agreements.

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<sup>23</sup> The NTCs also noted, however, that while they used the CCSCIS model to develop certain costs in connection with LIDB Access Service, the rates for that service are not cost based.

<sup>24</sup> MCI at p. 23; Allnet at pp. 3-5.

The NTCs use CCSCIS under an agreement with Bellcore. The agreement requires the NTCs to treat the CCSCIS model as confidential. The NTCs also agree that they will use the CCSCIS software solely for the NTCs' internal purposes.

In using the CCSCIS model, the NTCs input their own proprietary and confidential information. This information includes (i) inputs that allow the NTCs to customize CCSCIS based on the network in place, including discounts from the vendor list price; and (ii) feature inputs, including switch and customer-specific information relating to the use of the feature being studied.

The foregoing considerations preclude the NTCs from filing the CCSCIS model on the public record. In fact, as several commenters note, the Commission has recently ruled on the issue of whether another Bellcore cost model very similar to CCSCIS, the Switching Cost Information Systems ("SCIS") model used by most of the BOCs in connection with their ONA tariffs, must be disclosed on the public record. With respect to public disclosure of the SCIS cost model, the Commission concluded:

After conducting an in camera review of SCIS and its application...we have determined that the full SCIS model and supporting documentation, as well as the associated BOC materials and vendor data, should not be available for public inspection. The model and supporting documentation would be exempt from mandatory disclosure under FOIA, because both the model and documentation contain competitively sensitive materials

and because disclosure of these materials would compromise agency programs.<sup>25</sup>

While the CCSCIS model should not be filed on the public record, the NTCs would, however, be willing, as in the SCIS proceeding, to provide the Commission with the CCSCIS model utilized by the NTCs and copies of the NTCs' inputs to the CCSCIS model for in camera review.

In the SCIS Order, the Commission also determined that certain information relative to SCIS should be made available to parties to the tariff investigation with certain precautions in the form of redactions and nondisclosure agreements, and that SCIS materials that were too competitively sensitive to be disclosed under such nondisclosure arrangements would be subject to an independent audit. While the NTCs are prepared to work with the Commission to explore disclosure alternatives, an independent audit of CCSCIS is not appropriate. As has been noted, the CCSCIS model is quite similar to SCIS.<sup>26</sup> Audits of the type currently being conducted on the SCIS model are both expensive and time consuming. In the case of an audit of CCSCIS, the audit would also, to a significant extent, be duplicative of the audit of SCIS.

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<sup>25</sup> In the Matter of Commission Requirements for Cost Support Material to be Filed with Open Network Architecture Access Tariffs, 7 FCC Rcd 521 (1991) ("SCIS Order").

<sup>26</sup> See MCI at p. 22; Pacific Direct Case at p. 6.



V. THE RATE LEVELS FOR LIDB ACCESS SERVICE AND CCSA INTERCONNECTION ARE NOT EXCESSIVE

Several commenters argue that the LIDB Access Service and CCSA interconnection rates filed by the NTCs and other LECs are excessive and unjustified. Some argue that "the overhead factors used by the LECs vary widely"<sup>27</sup> or that "certain LECs may be inflating the investment by allocating portions of investment categories which are not used in the provision of the particular rate elements."<sup>28</sup>

The NTCs have explained fully the development of the overhead factors which they used to develop their rates for LIDB Access Service and CCSA interconnection.<sup>29</sup> They have also provided detailed information concerning the investment underlying the rate elements for these services, and the Part 32 accounts in which the investments were recorded.<sup>30</sup> Indeed, it should be noted that none of the commenting parties has suggested that the NTCs have employed incorrect overhead factors or inflated their investment.

Both Sprint and MCI argue that the NTCs should be required to reduce their LIDB Access Service rates, because

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<sup>27</sup> Sprint at p. 6.

<sup>28</sup> Id. at p. 5.

<sup>29</sup> See Direct Case at pp. 18-20. For LIDB Access Service, the NTCs developed the overhead factor based on local transport cable and wire investments and costs. Since CCSA is switching investment, the NTCs developed the CCSA overhead factor using COE switching investments and costs.

<sup>30</sup> Id. at p. 17, Attachment A.

"pricing above the fully loaded costs is unwarranted."<sup>31</sup> The Commission has noted, however, that:

Because we believe that the public interest will be served by providing LECs with an adequate incentive to innovate, we conclude that a flexible cost-based approach is the best way of controlling both excessive pricing and discrimination....In addition, local exchange price cap carriers will be permitted to include, as part of the justification for the prices they select, an analysis of the risk premium they believe they need to supplement their rate of return for a particular new service.<sup>32</sup>

Greater flexibility in the pricing of new services such as LIDB is also justified by risk factors of a type not expressly addressed by the Commission in its Part 69 ONA Order.<sup>33</sup> For example, there are business risks inherent in the development of new services such as LIDB. Development activities for any new service are risk-based by their nature, and will inevitably and necessarily involve some products that ultimately cannot be offered or that must be withdrawn from the market. The pricing of the "successful" new products must be sufficiently high to cover the costs associated with these risks of being in the business of developing new services.

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<sup>31</sup> Sprint at p. 9.

<sup>32</sup> In the Matter of Amendments of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture, CC Docket No. 89-79; Policy and Rules Concerning Rates for Dominant Carriers, CC Docket No. 89-713, 6 FCC Rcd 4524, 4531 (1991) ("Part 69 ONA Order").

<sup>33</sup> See The NTCs' Petition for Clarification and Reconsideration of the Part 69 ONA Order, dated August 26, 1991.

In light of the foregoing, the rates for LIDB Access Service are not excessive, and flexibility in pricing of the service is warranted.<sup>34</sup> There clearly are business risks inherent in the development of LIDB, since there are many alternatives to the NTCs' calling cards which can be used by the NTCs' customers for billing calls. Other telecommunications calling cards and commercial credit cards such as the AT&T, MCI and US Sprint calling cards, as well as Master Card or Visa may also be used for this purpose. In fact, as has been seen in at least one recent Commission proceeding,<sup>35</sup> some telecommunications calling card issuers are aggressively marketing their cards. To the extent competition from these calling cards displaces the NTCs' calling card, some of the LIDB investments could be stranded.

In sum, the proposed rates for LIDB Access Service are just and reasonable. They are consistent with the prices for

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34 The proposed rates for LIDB Access Service are comparable to, or less than, the rates charged for credit card validation by other credit card and calling card issuers. MCI suggests that the NTCs, by not accepting liability for fraud, as do issuers of commercial credit cards, are "offering an inferior service in comparison to commercial credit cards, but are attempting to have it both ways, and charge rates as if these services were on an equal footing." (MCI at p. 25.) MCI is incorrect. While the rates charged for calling card validation by the NTCs are comparable to those charged for validation by commercial credit card companies, commercial credit card companies impose additional charges, such as fees on cardholders and merchants accepting the credit card. These significant additional charges, which are not imposed by the NTCs, presumably are designed, in part, to cover the cost of fraud.

35 See, generally, In the Matter of AT&T Communications Revisions to Tariff FCC No. 1, DA 91-1583.

competitive alternatives, pass the net revenue test and cover relevant costs.


VI. CONCLUSION

The NTCs have demonstrated that their LIDB Access Service and CCSA interconnection tariffs and rates are just and reasonable. The tariffs should remain in effect without change and the accounting order and investigation should be terminated.

Respectfully submitted,

New York Telephone Company  
and  
New England Telephone and  
Telegraph Company

By:

  
Patrick A. Lee  
Edward E. Niehoff

120 Bloomingdale Road  
White Plains, NY 10605  
914-644-5971

Their Attorneys

Dated: June 15, 1992

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REPLY OF  
THE NYNEX TELEPHONE COMPANIES, was served by first class United  
States mail, postage prepaid, on each of the parties indicated  
on the attached service list, this 15th day of June, 1992.

  
LORRAINE COLUCCI

William B. Barfield  
Richard M. Sbaratta  
Helen A. Shockey  
BELLSOUTH  
1155 Peachtree, St., N.E.  
Suite 1800  
Atlanta, GA 30367-6000

Floyd S. Keene  
Michael T. Mulcahy  
Larry A. Peck  
AMERITECH SERVICES  
2000 W. Ameritech Center Drive  
Room 4H86  
Hoffman Estates, IL 60196-1025

John Goodman  
Michael D. Lowe  
BELL ATLANTIC NETWORK SERVICES  
1710 H Street, N.W.  
Washington, D.C. 20006

Durward D. Dupre  
Richard C. Hartgrove  
John Paul Walters, Jr.  
SOUTHWESTERN BELL TELEPHONE  
1010 Pine Street, Room 2114  
St. Louis, MO 63101

James P. Tuthill  
John W. Bogy  
PACIFIC BELL  
140 New Montgomery Street  
Room 1530-A  
San Francisco, CA 94105

Rochelle D. Jones  
Director - Regulatory  
SNET  
227 Church Street  
4th Floor  
New Haven, CT 06510-1806

Lawrence E. Sargeant  
Randall S. Coleman  
US WEST COMMUNICATIONS  
1020 19th Street, N.W.  
Suite 700  
Washington, D.C. 20036

Jay C. Keithley  
UNITED TELECOMMUNICATIONS  
1850 M Street, N.W.  
Suite 1100  
Washington, D.C. 20036

Gail L. Polivy  
GTE  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20026

H. Richard Juhnke  
SPRINT COMMUNICATIONS COMPANY, L.P.  
1850 M Street, N.W., 11th Fl.  
Washington, D.C. 20036

Robert J. Butler  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Roy L. Morris  
ALLNET COMMUNICATION SERVICES, INC.  
1990 M Street, N.W. Suite 500  
Washington, D.C. 20036

Andrew L. Regitsky  
MCI TELECOMMUNICATIONS CORPORATION  
1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

Gregory Casey  
INTERNATIONAL TELECHARGE, INC.  
6707 Democracy Blvd.  
Bethesda, Maryland 20817